

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MONICA ABBOUD, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

AGENTRA, LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§

Case No. 3:19-cv-120

**JOINT MOTION TO EXTEND
DISCOVERY AND CLASS CERTIFICATION DEADLINES**

Plaintiff Monica Abboud (“Plaintiff”) and Defendant Agentra, LLC (“Defendant”) file this Joint Motion to Extend the Discovery and Class Certification deadlines contained in the Court’s April 12, 2019 Class Certification Scheduling Order [Dkt. 25] as amended [Dkt. 30] and would respectfully show as follows:

The Court’s Class Certification Scheduling Order sets the Parties’ discovery deadline as January 13, 2020 and Plaintiff’s deadline to file her Motion for Class Certification on January 30, 2020. The Parties request that the Court extend the discovery deadline to **February 14, 2020**, and Plaintiff’s deadline to file her Motion for Class Certification to **March 2, 2020**. This extension allows the Parties to maximize the chance of a productive mediation by providing the opportunity to defer costs relating to fact discovery and class certification briefing until after mediation.

This request is not sought for delay but so that justice may be done.

PRAYER FOR RELIEF

For the reasons set forth above, the Parties request that this Court grant this Joint Motion to Extend Discovery and Class Certification Deadlines and extend the discovery deadline to

February 14, 2020 and Plaintiff's deadline to file her Motion for Class Certification to March 2, 2020.

Dated: January 7, 2020

Respectfully submitted,

/s/ William S. Richmond

WILLIAM S. RICHMOND

Texas Bar. No. 24066800

ANDREW LIN

Texas Bar. No. 24092702

LAURA E. BRANDT

Texas Bar. No. 24082369

PLATT CHEEMA RICHMOND PLLC

1201 N. Riverfront Blvd., Suite 150

Dallas, Texas 75307

Telephone: (214) 559-2700

Facsimile: (214) 559-4390

brichmond@pcrfirm.com

alin@pcrfirm.com

lbrandt@pcrfirm.com

**COUNSEL FOR DEFENDANT
AGENTRA, LLC**

/s/ Patrick Peluso

Steven L. Woodrow*

swoodrow@woodrowpeluso.com

Patrick H. Peluso*

ppeluso@woodrowpeluso.com

Taylor T. Smith*

tsmith@woodrowpeluso.com

Woodrow & Peluso, LLC

3900 East Mexico Ave., Suite 300

Denver, Colorado 80210

Telephone: (720) 213-0675

Facsimile: (303) 927-0809

**Admitted Pro Hac*

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned counsel for Defendant Agentra, LLC does hereby certify that this pleading was served on counsel of record on January 7, 2020 by electronic filing.

/s/ William S. Richmond

WILLIAM RICHMOND